UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

v.

SCOTTIE NELL HUGHES,

Plaintiff, : Civil Action No.: 17-cv-07093 (WHP)

:

TWENTY-FIRST CENTURY FOX, INC., FOX NEWS NETWORK LLC, DIANNE BRANDI, in her individual and professional capacities, and IRENA BRIGANTI, in her individual and professional capacities, CHARLES PAYNE, in his individual and professional capacities,

:

Defendants.

X

PLEASE TAKE NOTICE, that upon this motion dated February 8, 2018, the Declaration of Jeanne M. Christensen, also dated February 8, 2018, Declaration of Scottie Nell Hughes, also dated February 8, 2018, and supporting Exhibits thereto, Plaintiff Scottie Nell Hughes will respectfully move this Court, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Fed. R. Civ. P. Rule 45 quashing Defendants' four non-party subpoenas *duces tecum*, precluding Defendants from serving any additional subpoenas without proper notice to Plaintiff, and for such other and further relief as the Court may deem just and proper.

Dated: February 8, 2018 New York, New York

Respectfully submitted,

WIGDOR LLP

Jeanne M. Christensen

85 Fifth Avenue New York, NY 10003

Telephone: (212) 257-6800 jchristensen@wigdorlaw.com

Counsel for Plaintiff